

Liza M. Walsh
Eleonore Ofosu-Antwi
WALSH PIZZI O'REILLY FALANGA LLP
One Riverfront Plaza
1037 Raymond Blvd., Suite 600
Newark, New Jersey 07102
(973) 757-1100

*Attorneys for Defendants and Counterclaim-
Plaintiffs Purdue Pharma L.P., The P.F.
Laboratories, Inc., and Purdue Pharmaceuticals
L.P.*

Keith J. Miller
Michael Gesualdo
ROBINSON MILLER LLC
One Newark Center, 19th Floor
Newark, New Jersey 07102
(973) 690-5400

*Attorneys for Plaintiff
Depomed, Inc.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

DEPOMED, INC.,

Plaintiff,

v.

PURDUE PHARMA L.P., THE P.F.
LABORATORIES, INC., and PURDUE
PHARMACEUTICALS L.P.,
Defendants.

Civil Action No. 13-571-BRM-TJB

**NOTICE OF JOINT
MOTION TO SEAL**

MOTION RETURN DATE: APRIL 2, 2018

Filed Electronically

PLEASE TAKE NOTICE that on April 2, 2018, or as soon as the Court deems appropriate, Plaintiff Depomed, Inc. ("Plaintiff") and Defendants Purdue Pharma L.P., The P.F. Laboratories, Inc., and Purdue Pharmaceuticals L.P. (collectively, "Purdue") will appear before the Honorable Tonianne J. Bongiovanni, U.S.M.J., at the United States District Court for the District of New Jersey, Clarkson S. Fisher Federal Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey, and will move this Court pursuant to Local Civil Rule 5.3(c), for the entry of an Order to Seal portions of Exhibits 1-2 to Plaintiff's February 15, 2018 Letter to the Hon. Tonianne J. Bongiovanni, U.S.M.J. (D.E. 365).

PLEASE TAKE FURTHER NOTICE THAT the parties shall rely upon the accompanying Declaration of Liza M. Walsh, Proposed Findings of Fact and Conclusions of Law, and all papers submitted herewith. A proposed form of Order is also submitted for the Court's consideration.

Respectfully submitted,

By: s/ Liza M. Walsh
Liza M. Walsh
Eleonore Ofosu-Antwi
WALSH PIZZI O'REILLY FALANGA LLP
One Riverfront Plaza
1037 Raymond Boulevard, Suite 600
Newark, New Jersey 07102
(973) 757-1100

Of Counsel:

John J. Normile
Kelsey I. Nix
Gasper LaRosa
Lisamarie LoGiudice
JONES DAY
250 Vesey Street
New York, New York 10281
(212) 326-3939

*Attorneys for Defendants and Counterclaim-
Plaintiffs Purdue Pharma L.P., The P.F.
Laboratories, Inc., and Purdue
Pharmaceuticals L.P.*

Dated: March 7, 2018

By: s/ Keith J. Miller
Keith J. Miller
Michael Gesualdo
ROBINSON MILLER LLC
One Newark Center, 19th Floor
Newark, New Jersey 07102
(973) 690-5400

Of Counsel:

Paul J. Andre
Lisa Kobialka
Hannah Lee
KRAMER LEVIN NAFTALIS & FRANKEL
LLP
990 Marsh Road
Menlo Park, CA 94025
(650) 752-1700

Mark Baghdassarian
KRAMER LEVIN NAFTALIS & FRANKEL
LLP
1177 Avenue of the Americas
New York, NY 10036
(212) 715-9100

Attorneys for Plaintiff Depomed, Inc.